

30 West Monroe, Suite 1710  
Chicago  
Illinois 60603  
Tel 312.332.4937  
Fax 312.332.4434  
www.arcadis-us.com

Mr. Sam Borries  
On-Scene Coordinator  
USEPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, IL 60604-3590

SEDIMENTS

Subject:  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area Time-Critical Removal Action  
Monthly Report (October 2009)

Date:  
November 13, 2009

Dear Sam:

Contact:  
Steve Garbaciak

Attached is the 4<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

Phone:  
312.332.4937 ext. 12

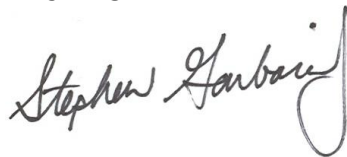
Email:  
steve.garbaciak@  
arcadis-us.com

Our ref:  
B0064536.0001.00014

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.  
Vice President

Copies:

Mike Ribordy, USEPA  
Leslie Kirby-Miles, USEPA  
Richard Karl, USEPA  
James Saric, USEPA  
Paul Bucholtz, MDEQ  
Jeff Keiser, CH2M HILL  
Kathy Huibregtse, RMT Inc.

Richard Gay, Weyerhaeuser Company  
Martin Lebo, Weyerhaeuser Company  
J. Michael Davis, Esq., Georgia-Pacific LLC  
Paul Montney, P.E., Georgia-Pacific LLC  
L. Chase Fortenberry, P.G., Georgia-Pacific LLC  
Garry Griffith, P.E., Georgia-Pacific LLC  
Michael Erickson, P.E., ARCADIS

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

**REPORT #4, OCTOBER 2009**

**PREPARED BY ARCADIS  
NOVEMBER 13, 2009  
ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**SAM BORRIES, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

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**Significant Developments and Activities During the Period**

- On October 1, United States Environmental Agency (USEPA) approved a 30-day extension to the original 30-day time frame to provide backup documenting all costs associated with mobilization activities, as defined in Paragraph 39c of the AOC.
- On October 1, ARCADIS submitted to USEPA information regarding the revised excavation plan and canoe portage details for Removal Area 5A. The excavation plan was revised due to the presence of a guy wire at the downstream end of Removal Area 5A. ARCADIS received approval from USEPA for the revised plan on October 14.
- On October 1, Michigan Department of Natural Resources (MDNR) provided ARCADIS permission to installed river closure signs and buoys in the Kalamazoo River.
- On October 5, 6, 8, 9, 13, 16, 19, 20, 23, 27, and 30 ARCADIS submitted to Weston (USEPA subcontractor) copies of turbidity monitoring logs, air monitoring logs, analytical data, waste manifests and/or chains of custody.
- On October 5 and 21, ARCADIS received analytical data for split samples collected by Weston.
- On October 5, ARCADIS submitted the 8<sup>th</sup> *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and Michigan Department of Environmental Quality (MDEQ).
- On October 5, ARCADIS received from USEPA notification of a change in the USEPA On-Scene Coordinator (OSC) from Mike Ribordy to Sam Borries.
- On October 6, Georgia-Pacific LLC and ARCADIS received notification from that that they were approved to join the Kalamazoo River Phosphorus Point Source Total Maximum Daily Loads (TMDL) cooperative agreement.
- On October 6, ARCADIS received notification from MDEQ that Substantive Requirements Document (SRD) MIU99028 had been approved and was effective immediately. A hard copy of the SRD was received on October 26.
- On October 6, ARCADIS submitted copies of pre-construction soil sampling results to private property owners Bruce Steele and Diana Steele Thompson, as required by the property access agreements.
- On October 7, ARCADIS received an executed copy of the property access agreement from Consumers Energy.

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- On October 7, ARCADIS submitted to MDNR, with copies to USEPA, MDEQ, and United States Fish and Wildlife Service (USFWS), a map estimating wetlands (based on National Wetland Inventory [NWI] wetland classifications) located in the removal areas and a technical memorandum presenting a hydraulic analysis of potential effects of removing the right diversion structure at the Plainwell No. 2 Dam. This information was requested by MDNR, MDEQ, and USFWS when the Design Report was submitted. This information was outside the scope of the design report.
- On October 14, ARCADIS submitted the 9<sup>th</sup> *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On October 15, ARCADIS submitted to MDEQ an executed copy of the TMDL cooperative agreement.
- On October 15, ARCADIS submitted to USEPA the 3<sup>rd</sup> *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for September 2009.
- On October 16 and 19, ARCADIS, USFWS, and MDNR discussed the footprint of the TCRA areas as they related to the wetlands maps submitted on October 7. ARCADIS will submit a revised figure to MDNR when the project as-built drawings are completed after completion of the construction.
- On October 16 and 19, ARCADIS, USEPA, and MDNR discussed information to be covered and potential dates for the next public meeting to be held in Plainwell, tentatively scheduled to be held during the first week of December.
- On October 20, ARCADIS submitted shape files for the wetlands delineation polygons to USFWS.
- On October 21, ARCADIS and Georgia-Pacific hosted the monthly Stakeholder's Meeting. Representatives from MDNR and USFWS attended the meeting.
- On October 22, ARCADIS attended the Kalamazoo River Phosphorus Point Source meeting for signees of the TMDL cooperative agreement.
- On October 22, ARCADIS submitted the 10<sup>th</sup> *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On October 27, ARCADIS submitted the 11<sup>th</sup> *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On October 29, ARCADIS submitted to Weston copies of the 9<sup>th</sup>, 10<sup>th</sup>, and 11<sup>th</sup> *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA*.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
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Plainwell No. 2 Dam Area TCRA**

**REPORT #4, OCTOBER 2009**

**Data Collected and Field Activities Conducted During the Period**

- During the week of October 1, ARCADIS constructed access to Island 1, installed resuspension controls in Removal Area 2, completed removal activities in Removal Area 1 and Island 1, and continued removal activities in Removal Area 2. Four confirmation samples (TS20291 through TS20294) were collected from Removal Areas 1 and 2 and submitted for polychlorinated biphenyl (PCB) analysis. USEPA collected a split sample of TS20291 (PD2-100109-02-SD/TS20291). Two surface water samples (TS30135 and TS30136) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the upstream grids (1 through 6) of Removal Area 2. A rinse blank (TS30137) was also collected. Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of October 5, ARCADIS installed additional river closure signs, removed access to Island 1, installed resuspension controls in Removal Area 3A, removed resuspension controls in Removal Area 1, completed removal activities in Removal Area 2, began removal activities in Removal Area 3A, began restoration activities in Removal Areas 1 and 2, and began treatment and discharge of water collected at the Staging Area. Seven confirmation samples (TS20295 and TS20297 through TS20302) and one duplicate sample (TS20296) were collected from Removal Areas 2 and 3A and submitted for PCB analysis. Two surface water samples (TS30138 and TS30139) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the upstream grids (1 through 11) of Removal Area 3A. A rinse blank (TS30140) was also collected. Two sets of wastewater samples (W\_SA3\_X\_001 and W\_SA3\_X\_002) were collected from the water treatment system located at Staging Area 3. Each set of wastewater samples consists of one influent (e.g., W\_SA3\_In\_001), two mid-fluent (e.g., W\_SA3\_RM\_001 and W\_SA3\_LM\_001), and two effluent samples (e.g., W\_SA3\_RE\_001 and W\_SA3\_LE\_001). Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of October 12, ARCADIS, installed resuspension controls in Removal Area 4A, removed resuspension controls in Removal Area 2, continued removal activities in Removal Area 3A, continued restoration activities in Removal Areas 1 and 2, and continued treatment and discharge of water collected at the Staging Area. Twelve confirmation samples (TS20303 through TS20315) and one duplicate sample (TS20316) were collected from Removal Area 3A and submitted for PCB analysis. USEPA collected a split sample of TS20303 (PD2-101209-03-SD/TS20303) and of TS20309 (PD2-101409-04-SD/TS20309). Two surface water samples (TS30141 and TS30143) were collected from the upstream and downstream, respectively, turbidity monitoring locations near the downstream grids (11 through 22) of Removal Area 3A. A duplicate sample (TS30142) and rinse

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blank (TS30144) were also collected. One set of water treatment samples (W\_SA3\_X\_003) was collected from the water treatment system located at Staging Area 3. A duplicate of W\_SA3\_RE\_003 (W\_SA3\_Dup\_001) was also collected. Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

- During the week of October 19, ARCADIS installed resuspension controls in Removal Area 5A, removed resuspension controls in Removal Area 3A, completed removal activities in Removal Areas 3A and 4A, began removal activities in Removal Area 5A, continued restoration activities in Removal Areas 1 and 2, and continued treatment and discharge of water collected at the Staging Area. Fifteen confirmation samples (TS20317 through TS20331) were collected from Removal Areas 3A, 4A, and 5A and submitted for PCB analysis. USEPA collected a split sample of TS20322 (PD2-102009-05-SD/TS20322) and of TS20330 (PD2-102209-06-SD/TS20330). Two surface water samples (TS30145 and TS30146) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5A. A rinse blank (TS30147) was also collected. A nine-part composite sample (TS10048) was collected from the topsoil source. The sample was submitted for diesel range organics (DROs), gasoline range organics (GROs), target compound list (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs), PCBs, TCL pesticides, total organic carbon (TOC), Resource Conservation and Recovery Act (RCRA) metal, pH, total organic carbon and grain size analysis. One set of water treatment samples (W\_SA3\_X\_004) was collected from the water treatment system located at Staging Area 3. USEPA collected a split sample of W\_SA3\_LE\_004 (PD2-102309-01-WT/W\_SA3\_LE\_004). Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of October 26, ARCADIS removed resuspension controls in Removal Area 4A, completed removal activities in Removal Areas 5A, continued restoration activities in Removal Areas 3A and 4A, began equipment demobilization activities, and continued treatment and discharge of water collected at the Staging Area. Six confirmation samples (TS20332 through TS20335 and TS20337 through TS20338) and one duplicate sample (TS20336) were collected from Removal Areas 3A and 5A and submitted for PCB analysis. Two surface water samples (TS30148 and TS30149) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5A. A rinse blank (TS30150) was also collected. Two sets of water treatment samples (W\_SA3\_X\_005 and W\_SA3\_X\_006) were collected from the water treatment system located at Staging Area 3. Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

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- As of October 31, approximately 4,700 cubic yards of material had been excavated from Removal Areas 1, 2, 3A, 4A, 5A and Island 1.

**Laboratory Data Received During the Period**

- During the week of October 1, ARCADIS received analytical data for confirmation samples TS20278 to TS20287 (collected in September).
- During the week of October 5, ARCADIS received analytical data for confirmation samples TS20288 to TS20290 (collected in September) and TS20291 to TS20300; USEPA split sample PD2-100109-02-SD/TS20291; and water treatment sample set W\_SA3\_X\_001.
- During the week of October 12, ARCADIS received analytical data for confirmation samples TS20301 to TS20307; 6A aggregate and crushed concrete samples TS10042 and TS10043 (PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides – DROs and GROs were received in September – samples were collected in September); and water treatment sample set W\_SA3\_X\_002.
- During the week of October 19, ARCADIS received analytical data for confirmation samples TS20308 to TS20323, TS20330, and TS20331; USEPA split samples PD2-101209-03-SD/TS20303, PD2-101409-04-SD/TS20309, and PD2-102009-05-SD/TS20322; and water treatment sample set W\_SA3\_X\_003.
- During the week of October 26, ARCADIS received analytical data for confirmation samples TS20324 to TS20329 and TS20332 to TS20338; and water treatment samples sets W\_SA3\_X\_004 and W\_SA3\_X\_005.
- ARCADIS is awaiting analytical data for USEPA split samples PD2-102209-06-SD/TS30330 and PD2-102309-01-WT/W\_SA3\_LE\_004, topsoil sample TS10048, surface water samples TS30132 to TS30150, and water treatment sample set W\_SA3\_X\_006.

**Issues Encountered and Actions Taken**

- A PCB concentration of 6.9 milligrams per kilogram (mg/kg) was detected in soil sample TS20279, collected from Removal Area 1, Grid 6 on September 24. An additional 6 inches of material was excavated and sample TS20294 was collected on October 2. PCBs were not detected in the sample (<0.33 mg/kg). No additional excavation is warranted.
- A PCB concentration of 8.2 mg/kg was detected in soil sample TS20333, collected from Removal Area 5A, Grid 4 on October 26. An additional 6 inches of material was excavated and sample

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TS20338 was collected on October 28. A PCB concentration of 0.39 mg/kg was detected in the sample. No additional excavation is warranted.

- The owner of the McMurtrie property verbally confirmed that he would not sign the access agreement if the proposed location of Staging Area 2 was not altered because he is concerned it will interfere with daily activities on his property, which is currently utilized as a horse training facility. The proposed location for Staging Area 2 is located on the Simons' property adjacent to the McMurtrie property. ARCADIS and Georgia-Pacific are negotiating with the owner of the Simons property to move the location of Staging Area 2 and will continue negotiations in November (Table A).
- ARCADIS and Georgia-Pacific met with the owner of the Simons property in October and are negotiating a compensation package with the owner of the Simons property for access to their properties. The owner of the Simons property is reluctant to allow ARCADIS to access their property and remove the vegetation necessary to support removal activities.

**Developments Anticipated During the Next Reporting Period**

- During the week of November 2, ARCADIS is scheduled to remove resuspension controls from Removal Area 5A, continue equipment demobilization, continue restoration activities, and complete loading and transporting processed material to the appropriate landfill.
- During the week of November 9, ARCADIS is scheduled to continue equipment demobilization activities, continue restoration activities, install the canoe portage, and begin removal of Staging Area 3.
- During the week of November 16, ARCADIS is scheduled to host the monthly Stakeholder's Meeting, complete equipment demobilization activities, complete restoration activities for the 2009 construction season through Removal Area 5A, and complete removal of Staging Area 1.
- No field activities are scheduled for the weeks of November 23 or 30.
- In November, ARCADIS will continue submitting Weekly Construction Reports for the Plainwell No. 2 Dam Area TCRA to USEPA.
- In November, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.



**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

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**Updates to the Former Plainwell Impoundment TCRA**

- On October 1, ARCADIS followed up with USEPA regarding the draft technical memorandum submitted on September 15 regarding the recommended approach for addressing the bank stabilization issues in Removal Areas 8 and 9B. ARCADIS received approval from USEPA to implement the recommended approach for addressing the bank stabilization issues on October 8.
- On October 7, ARCADIS received from the TMDL cooperative copies of the cooperative's report on phosphorus discharge from the Former Plainwell Impoundment TCRA.
- During the week of October 26, ARCADIS began construction on the agreed upon approach to address bank stabilization issues in Removal Area 8 and 9B.
- During the week of October 26, ARCADIS began seeding of the haul road in Removal Areas 6B and 10A through 13A.
- On October 29, ARCADIS submitted to USEPA, MDEQ, MDNR, and USFWS the *Former Plainwell Impoundment 2009 Bank Conditions Monitoring Report*.

**Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA**

- During the week of November 2, ARCADIS is scheduled to complete bank stabilization activities in Removal Area 8 and 9B.
- During the week of November 2, ARCADIS is scheduled to complete seeding of the haul road in Removal Areas 6B and 10A through 13A.
- ARCADIS awaits approval from USEPA of the Construction Completion report submitted in August 2009.

**Georgia-Pacific, LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
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**Table A — Summary of Property Access Agreements (as of October 31, 2009)**

<b>Date Sent</b>	<b>Property Owner</b>	<b>Pacel Number</b>	<b>Status</b>
6/10/2009	Arcan Inc.	08-032-010-00	accepted (received 6/18/09)
5/22/2009	Consumers Energy	08-032-015-00	accepted (received 10/07/09)
7/31/2009	Diana Steele Thompson	08-032-005-10	accepted (received 8/4/09)
5/22/2009	Edward and Ronald Hodgman	08-032-027-00	accepted (received 6/3/09)
5/22/2009	Edward Mc Murtrie	08-032-042-00	in negotiations
5/22/2009	Howe Aluminum Products	08-032-028-00	accepted (received 6/3/09)
7/31/2009	MDNR	08-032-041-00 08-032-040-00	accepted (received 8/7/09)
5/22/2009	Michelle and Paul Simons	08-032-034-10 08-032-039-00 08-032-006-00	in negotiations
7/29/2009	Steele Trust	08-033-012-00 08-033-009-00 08-033-018-00	accepted (received 8/3/09)
8/4/2009	Ray Hendricksma	08-032-033-00	accepted (received 8/7/09)
	Terry Winkle		accepted (received 8/10/09)

Georgia-Pacific LLC  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
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**Table B — Summary of Samples Collected and Data Received in October 2009**

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action	
Confirmation Samples										
TS20278	09/24/09	10/01/09	097354	KAR Labs	RA 1, Grid 5	PCBs	4.6 mg/kg	5 mg/kg	None	
TS20279					RA 1, Grid 6	PCBs	6.9 mg/kg	5 mg/kg	Excavate addiitonal 6 inches of material and resample (TS20294)	
TS20280					RA 1, Grid 7	PCBs	4.7 mg/kg	5 mg/kg		None
TS20281					RA 1, Grid 8	PCBs	2.1 mg/kg	5 mg/kg		None
TS20284	09/29/09	10/02/09	093811	KAR Labs	RA 1, Grid 9	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20285					RA 1, Grid 10	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20286					RA 1, Grid 11	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20287					RA 1, Grid 12	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20288	09/30/09	10/07/09	093831	KAR Labs	RA 2, Grid 1	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20289					RA 2, Grid 2	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20290					RA 2, Grid 3	PCBs	2.4 mg/kg	5 mg/kg	None	
TS20291 <sup>1</sup>	10/01/09	10/08/09	093850	KAR Labs	RA 2, Grid 4	PCBs	4.2 mg/kg	5 mg/kg	None	
<b>PD2-100109-02-SD/TS20291</b>	<b>10/01/09</b>	<b>10/05/09</b>	<b>0910017</b>	<b>TriMatrix Laboratories</b>	<b>RA 2, Grid 4</b>	<b>PCBs</b>	<b>1.5 mg/kg J</b>	<b>5 mg/kg</b>	<b>None</b>	
TS20292	10/01/09	10/08/09	093850	KAR Labs	RA 2, Grid 5	PCBs	3.7 mg/kg	5 mg/kg	None	
TS20293					RA 2, Grid 6	PCBs	0.87 mg/kg	5 mg/kg	None	
TS20294	10/02/09	10/02/09	093852	KAR Labs	RA 1 Grid 6	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20295	10/05/09	10/08/09	093886	KAR Labs	RA 2, Grid 7	PCBs	0.86 mg/kg	5 mg/kg	None	
[TS20296]					[PCBs]	[0.71 mg/kg]	[5 mg/kg]	[None]		
TS20297					RA 2, Grid 8	PCBs	3.1 mg/kg	5 mg/kg	None	
TS20298	10/08/09	10/09/09	093959	KAR Labs	RA 2, Grid 9	PCBs	0.89 mg/kg	5 mg/kg	None	
TS20299					RA 2, Grid 10	PCBs	0.71 mg/kg	5 mg/kg	None	
TS20300					RA 3A, Grid 1	PCBs	0.75 mg/kg	5 mg/kg	None	
TS20301	10/09/09	10/15/09	093995	KAR Labs	RA 3A, Grid 2	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20302					RA 3A, Grid 3	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20303 <sup>1</sup>	10/12/09	10/15/09	094010	KAR Labs	RA 3A, Grid 4	PCBs	0.4 mg/kg	5 mg/kg	None	
<b>PD2-101209-03-SD/TS20303</b>	<b>10/12/09</b>	<b>10/21/09</b>	<b>0910192</b>	<b>TriMatrix Laboratories</b>	<b>RA 3A, Grid 4</b>	<b>PCBs</b>	<b>0.41 mg/kg J</b>	<b>5 mg/kg</b>	<b>None</b>	
TS20304	10/12/09	10/15/09	094010	KAR Labs	RA 3A, Grid 5	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20305					RA 3A, Grid 6	PCBs	3.0 mg/kg	5 mg/kg	None	
TS20306	10/13/09	10/16/09	094045	KAR Labs	RA 3A, Grid 7	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20307					RA 3A, Grid 8	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20308	10/14/09	10/21/09	094079	KAR Labs	RA 3A, Grid 11	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20309 <sup>1</sup>					RA 3A, Grid 12	PCBs	0.33 mg/kg U	5 mg/kg	None	
<b>PD2-101409-04-SD/TS20309</b>	<b>10/14/09</b>	<b>10/21/09</b>	<b>0910243</b>	<b>TriMatrix Laboratories</b>	<b>RA 3A, Grid 12</b>	<b>PCBs</b>	<b>0.24 mg/kg J</b>	<b>5 mg/kg</b>	<b>None</b>	
TS20310	10/14/09	10/21/09	094079	KAR Labs	RA 3A, Grid 13	PCBs	0.48 mg/kg	5 mg/kg	None	
TS20311	10/15/09	10/22/09	094088	KAR Labs	RA 3A, Grid 14	PCBs	3.0 mg/kg	5 mg/kg	None	
TS20312	10/16/09	10/22/09	094135	KAR Labs	RA 3A, Grid 15	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20313					RA 3A, Grid 16	PCBs	0.63 mg/kg	5 mg/kg	None	
TS20314					RA 3A, Grid 17	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20315					RA 3A, Grid 18	PCBs	0.36 mg/kg	5 mg/kg	None	
[TS20316]	10/19/09	10/22/09	094147	KAR Labs	[PCBs]	[0.42 mg/kg]	[5 mg/kg]	[None]		
TS20317					RA 3A, Grid 19	PCBs	1.7 mg/kg	5 mg/kg	None	
TS20318					RA 3A, Grid 20	PCBs	4.2 mg/kg	5 mg/kg	None	
TS20319					RA 3A, Grid 21	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20320	10/20/09	10/23/09	094176	KAR Labs	RA 3A, Grid 22	PCBs	2.1 mg/kg	5 mg/kg	None	
TS20321					RA 4A, Grid 1	PCBs	0.33 mg/kg U	5 mg/kg	None	
TS20322 <sup>1</sup>					RA 4A, Grid 2	PCBs	0.33 mg/kg U	5 mg/kg	None	

Georgia-Pacific LLC  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA  
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**Table B — Summary of Samples Collected and Data Received in October 2009**

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Confirmation Samples (cont'd)</b>									
<b>PD2-102009-05-SD/TS20322</b>	10/20/09	10/21/09	0910334	<b>TriMatrix Laboratories</b>	<b>RA 4A, Grid 2</b>	<b>PCBs</b>	<b>0.064 mg/kg J</b>	<b>5 mg/kg</b>	<b>None</b>
TS20323	10/20/09	10/23/09	094176	KAR Labs	RA 4A, Grid 3	PCBs	1.7 mg/kg	5 mg/kg	None
TS20324	10/21/09	10/26/09	094195	KAR Labs	RA 4A, Grid 4	PCBs	2.1 mg/kg	5 mg/kg	None
TS20325					RA 4A, Grid 5	PCBs	4.2 mg/kg	5 mg/kg	None
TS20326					RA 4A, Grid 6	PCBs	4.1 mg/kg	5 mg/kg	None
TS20327					RA 4A, Grid 7	PCBs	2.7 mg/kg	5 mg/kg	None
TS20328					RA 4A, Grid 8	PCBs	2.6 mg/kg	5 mg/kg	None
TS20329	10/22/09	10/26/09	094215	KAR Labs	RA 4A, Grid 9	PCBs	2.1 mg/kg	5 mg/kg	None
TS20330 <sup>1</sup>		10/23/09	094213	KAR Labs	RA 5A, Grid 1	PCBs	0.33 mg/kg U	5 mg/kg	None
<b>PD2-102209-06-SD/TS20330</b>	10/22/09	<b>NR</b>	<b>NR</b>	<b>TriMatrix Laboratories</b>	<b>RA 5A, Grid 1</b>	<b>PCBs</b>	<b>-</b>	<b>-</b>	<b>-</b>
TS20331	10/22/09	10/23/09	094213	KAR Labs	RA 5A, Grid 2	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20332	10/26/09	10/27/09	094255	KAR Labs	RA 5A, Grid 5	PCBs	0.73 mg/kg	5 mg/kg	None
TS20333		10/27/09	094255	KAR Labs	RA 5A, Grid 4	PCBs	8.2 mg/kg	5 mg/kg	Excavate additiional 6 inches of material and resample (TS20338)
TS20334					RA 5A, Grid 3	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20335					RA 3A, Grid 9	PCBs	0.33 mg/kg U	5 mg/kg	None
[TS20336]						[PCBs]	[0.33 mg/kg U]	[5 mg/kg]	[None]
TS20337					RA 3A, Grid 10	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20338	10/28/09	10/29/09	094310	KAR Labs	RA 5A, Grid 4	PCBs	0.39 mg/kg	5 mg/kg	None
<b>Fill Material Sampling</b>									
TS10042	09/08/09	09/22/09 (KAR) and 10/14/09 (TAL)	093507 (KAR) and KAL478 (TAL)	KAR Labs and TAL	9-part composite sample from 6A aggregate material	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides (TAL) DROs and GROs (KAR)	0.056 mg/kg U	4 mg/kg	None <sup>2</sup>
TS10043	09/08/09	09/22/09 (KAR) and 10/14/09 (TAL)	093507 (KAR) and KAL478 (TAL)	KAR Labs and TAL	9-part composite sample from crushed concrete material	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides (TAL) DROs and GROs (KAR)	0.052 mg/kg U	4 mg/kg	None <sup>2</sup>
TS10048	10/22/09	NR	NR	KAR Labs and TAL	9-part composite sample from topsoil	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides, total organic carbon, grain size, and pH (TAL) DROs and GROs (KAR)	-	-	-
<b>Surface Water Samples</b>									
TS30132	09/24/09	NR	NR	TAL	RA-1 Grids 1-8; 300 feet downstream	PCBs	-	-	-
TS30133					RA-1 Grids 1-8; 200 feet upstream	PCBs	-	-	-
TS30134					Rinse Blank	PCBs	-	-	-
TS30135	10/01/09	NR	NR	TAL	RA-2, Grids 1-6; 300 feet downstream	PCBs	-	-	-
TS30136					RA-2, Grids 1-6; 200 feet upstream	PCBs	-	-	-
TS30137					Rinse Blank	PCBs	-	-	-
TS30138	10/08/09	NR	NR	TAL	RA-3A, Grids 1-11; 300 feet downstream	PCBs	-	-	-
TS30139					RA-3A, Grids 1-11 ; 200 feet upstream	PCBs	-	-	-
TS30140					Rinse Blank	PCBs	-	-	-
TS30141	10/15/09	NR	NR	TAL	RA-3A Grids 11-22, 200 feet upstream	PCBs	-	-	-
[TS30142]					RA-3A Grids 11-22, 200 feet upstream	PCBs	-	-	-
TS30143					RA-3A Grids 11-22, 300 feet downstream	PCBs	-	-	-
TS30144	10/22/09	NR	NR	TAL	Rinse Blank	PCBs	-	-	-
TS30145					RA-5A, 300 feet downstream	PCBs	-	-	-
TS30146					RA-5A, 200 feet upstram	PCBs	-	-	-
TS30147					Rinse Blank	PCBs	-	-	-

**Georgia-Pacific LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #4, October 2009**

**Table B — Summary of Samples Collected and Data Received in October 2009**

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Surface Water Samples (cont'd)									
TS30148	10/29/09	NR	NR	TAL	RA-5A, 300 feet downstream	PCBs	-	-	-
TS30149					RA-5A, 200 feet upstram	PCBs	-	-	-
TS30150					Rinse Blank	PCBs	-	-	-
Water Treatment Samples									
W_SA3_In_001	10/05/09	10/08/09	093885	KAR Labs	Influent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RM_001					Right side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RE_001					Right side Effluent; SA 3 Water Treatment	PCBs, TSS, P	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.13 mg/L, No Action Limit
W_SA3_LM_001					Left side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_LE_001					Left side Effluent; SA 3 Water Treatment	PCBs, TSS, P	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.06 mg/L, No Action Limit
W_SA3_In_002	10/08/09	10/13/09	093960	KAR Labs	Influent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RM_002					Right side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RE_002					Right side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3_LM_002					Left side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_LE_002					Left side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3_In_003	10/14/09	10/19/09	094080	KAR Labs	Influent; SA 3 Water Treatment	PCBs	0.1 µg/L	No Action Limit	None
W_SA3_RM_003					Right side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RE_003 [W_SA3_Dup_001]					Right side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L [< 0.1 µg/L]	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L [None: TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA3_LM_003					Left side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_LE_003					Left side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3_In_004	10/23/09	10/26/09	094216	KAR Labs	Influent; SA 3 Water Treatment	PCBs	1 µg/L	No Action Limit	None
W_SA3_RM_004					Right side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RE_004					Right side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3_LM_004					Left side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_LE_004 <sup>1</sup>					Left side Effluent; SA 3 Water Treatment	PCBs and TSS	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
PD2-102309-01-WT/ W_SA3_LE_004	10/23/09	NR	NR	TriMatrix Laboratories	Left side Effluent; SA 3 Water Treatment	PCBs	-	-	-

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**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #4, October 2009**

**Table B — Summary of Samples Collected and Data Received in October 2009**

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Water Treatment Samples (cont'd)</b>									
W_SA3_In_005	10/26/09	10/29/09	094256	KAR Labs	Influent; SA 3 Water Treatment	PCBs	0.1 µg/L	No Action Limit	None
W_SA3_RM_005					Right side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_RE_005					Right side Effluent; SA 3 Water Treatment	PCBs, TSS, P	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10 <sup>-5</sup> µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.04 mg/L, No Action Limit
W_SA3_LM_005					Left side Mid-fluent; SA 3 Water Treatment	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA3_LE_005					Left side Effluent; SA 3 Water Treatment	PCBs, TSS, P	< 0.1 µg/L	0.2 µg/L per discharge; Monthly Average of 2.6 x 10 <sup>-5</sup> µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.03 mg/L, No Action Limit
W_SA3_In_006	10/30/09	NR	NR	KAR Labs	Influent; SA 3 Water Treatment	PCBs	-	-	-
W_SA3_RM_006					Right side Mid-fluent; SA 3 Water Treatment	PCBs	-	-	-
W_SA3_RE_006					Right side Effluent; SA 3 Water Treatment	PCBs and TSS	-	-	-
W_SA3_LM_006					Left side Mid-fluent; SA 3 Water Treatment	PCBs	-	-	-
W_SA3_LE_006					Left side Effluent; SA 3 Water Treatment	PCBs and TSS	-	-	-

**Notes:**

1 - Split of the sample collected by USEPA.

2 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDEQ's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).

\* Duplicate samples are shown in brackets.

\* Analytical results have not been validated.

DRO - diesel range organic

GRO - gasoline range organic

J - The compound was positively identified; however, the associated numerical value is an estimated concentration only.

mg/kg - milligrams per kilogram

MDEQ - Michigan Department of Environmental Quality

NR - not received

P - total phosphorus

PCBs - polychlorinated biphenyls

RA - Removal Area

RBSL - Risk Based Screening Level

RCRA - Resource Conservation and Recovery Act

RRD - Remediation Redevelopment Division

SA - Staging Area

SVOCs - semivolatile organic compounds

TAL - TestAmerica Laboratories

TCL - target compound list

TSS - total suspended solids

U - Compound analyzed but not detected at a concentration above the reporting limit

USEPA - United States Environmental Protection Agency

VOCs - volatile organic compounds